IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

PAUL HOBIN,

Plaintiff,

v.

Case No. 3:23-cv-1298-L

CITY OF HUTCHINS, TEXAS, and FIRE CHIEF STACEY HICKSON (in his individual capacity),

Defendants.

JOINT SETTLEMENT STATUS REPORT

Plaintiff Paul Hobin and Defendants City of Hutchins, Texas and Fire Chief Stacey Hickson (collectively "Defendants"), by and through their undersigned counsel, hereby submit this Joint Settlement Status Report pursuant to the Court's August 11, 2023 Scheduling Order, and state as follows:

- 1. Plaintiff filed the complaint in this matter on June 9, 2023. Defendants filed an answer on July 3, 2023.
- 2. Since that time, Counsel for Plaintiff contacted Defendants' counsel and sent a settlement proposal for Defendants' consideration via email on August 28, 2023, and September 21, 2023, which sets forth proffered terms to resolve this dispute and dispose of this action in its entirety.
- 3. To date, Defendants have not made a counter-offer to Plaintiff's settlement proposal, as Defendants believe that the parties are currently too far apart to make meaningful settlement progress at this time, particularly with mediation set for December 11, 2023.

4. In this regard, Defendants prefer to engage in settlement discussions at the December 11, 2023, mediation conference to be conducted by Magistrate Judge Horan pursuant to this Court's Order of August 11, 2023 (doc. 16) and Judge Horan's Order of September 5, 2023 (doc. 17). The parties will continue in good faith to discuss the potential for settlement of this matter.

Respectfully submitted,

/s/ Matthew D. Watts

MATTHEW D. WATTS (admitted *pro hac vice*) D.C. Bar No. 1030130 Mooney, Green, Saindon, Murphy & Welch, P.C. 1920 L Street NW, Suite 400 Washington, DC 20036

Tel.: (202) 783-0010; Fax: (202) 783-6088 Email: mwatts@mooneygreen.com Counsel for Plaintiff Paul Hobin

/s/ Tamara Y. Imam

TAMARA Y. IMAM (admitted pro hac vice)
D.C. Bar No. 90003344
Mooney, Green, Saindon, Murphy & Welch, P.C.
1920 L Street NW, Suite 400
Washington, DC 20036
Tel.: (202) 783-0010; Fax: (202) 783-6088

Email: timam@mooneygreen.com

Counsel for Plaintiff Paul Hobin

/s/ Sanford R. Denison

SANFORD R. DENISON Tex. Bar No. 05655560 Baab & Denison, LLP 6301 Gaston Ave., Suite 1403 Dallas, TX 75214

Tel.: (214) 637-0750; Fax.: (214) 637-0730

Email: <u>denison@baabdenison.com</u> Counsel for Plaintiff Paul Hobin

/s/ Gerald Bright

GERALD BRIGHT

State Bar No. 02991720

WALKER BRIGHT PC

100 North Central Expressway, Suite 800

Richardson, Texas 75080 Telephone: (972) 744-0192 Telecopier: (972) 744-0067 Email: efiledallas@wblpc.com

Counsel for Defendants City of Hutchins, Texas and

Fire Chief Stacey Hickson

/s/ David L. Craft

DAVID L. CRAFT

State Bar No. 00790522

WALKER BRIGHT PC

100 North Central Expressway, Suite 800

Richardson, Texas 75080 Telephone: (972) 744-0192 Telecopier: (972) 744-0067 Email: david.craft@wblpc.com

Counsel for Defendants City of Hutchins, Texas and

Fire Chief Stacey Hickson

Dated: November 9, 2023

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2023, the foregoing was served via the Court's electronic filing system (CM/ECF) on all registered individuals, including:

Gerald Bright
David L. Craft
Walker Bright PC
100 North Central Expressway, Suite 800
Richardson, Texas 75080
efiledallas@wblpc.com
david.craft@wblpc.com

/s/ Matthew D. Watts
Matthew D. Watts

Dated: November 9, 2023